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10 **ATTORNEYS FOR DEFENDANTS**

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13 **WESTERN DISTRICT**

14 **DAVID HOUGH, et al.**

15 *Plaintiffs,*

16 **v.**

17 **RYAN CARROLL, et al.**

18 *Defendants.*

Case No.: 2:24-cv-02886

Assigned for all purposes to:
JUDGE WESLEY L. HSU

**WILLIAM SHIBLEY'S
AFFIDAVIT IN SUPPORT OF
DEFENDANTS' APPLICATION
FOR LEAVE TO FILE UNDER
SEAL**

Hearing: 8/23/24, 1:30 p.m. PT

Action Filed: April 9, 2024
Trial Date: N/A

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24 BEFORE ME, the undersigned authority, on this day personally appeared
25 **William Shibley**, and being duly sworn upon his oath by me, deposed and stated as
26 follows:
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1 1. "My name is **William Shibley**. I am an attorney licensed to practice before
2 this court and have been an attorney since June of 1973. I am of sound mind and
3 fully capable to make this Affidavit. The facts set forth herein are based on my
4 personal knowledge and are true and correct.

5 2. I submit this declaration in connection with and in support of Human
6 Jurisdictional Defendants' Application to File Under Seal.

7 3. Human Jurisdictional Defendants agreed to produce their accounts in which
8 \$9,000 may be withdrawn pursuant to the April 30, 2024 Order. *See* Dkt. 38.

9 4. Attached as **Exhibit A** is the Letter informing the Court of Human
10 Jurisdictional Defendants' accounts in which \$9,000 may be withdrawn.

11 5. Exhibit A contains sensitive financial information pertaining to the Human
12 Jurisdictional Defendants. Disclosure of this information could result in significant
13 harm to the privacy and financial interests of these parties. Therefore, the interests
14 of justice and confidentiality necessitate that Exhibit A be filed under seal to protect
15 the sensitive financial data contained therein.

16 6. On July 5, 2024, I attempted to confer with Plaintiffs' Counsel regarding the
17 Application to File Under Seal and did not receive a response.

18 I declare under the laws of the State of California that the foregoing is true
19 and correct.

20 FURTHER AFFIANT SAYETH NOT.

21
22 
23 WILLIAM SHIBLEY

24 **CERTIFICATE OF SERVICE**

25 I hereby certify that a true and correct copy of the foregoing document, and
26 any attachments, will be served to counsel of record, in accordance with the
27 governing rules of procedure regarding service in this court on this **July 5, 2024**, via
28 email as follows:

/s/ William Shibley
William Shibley